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RCRA CLOSURE PLAN

MONSANTO CHEMICAL COMPANY W.G. KRUMMRICH PLANT SAUGET, ILLINOIS USEPA ID: ILD 000 802 702 IEPA ID: 1631210006

Prepared for:

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Submitted to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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This document has been prepared in accordance with accepted scientific and engineering practices and procedures and Versar, Inc's Quality Assurance Program.

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= 2/19/97 Date 197

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			T/ DESCRIPTIO	able D-1 N of Con'	rainers	
WASTE STREAM COMMON NAME & EPA WASTE CLASSIFICATION	WASTE DESCRIPTION	PHYSICAL STATE	CONTAINER SIZE/TYPE	DRUM STOCK NUMBER ¹	Barrier or internal Coating Type	CONTAINER COMPATIBILITY RATIONALE
			ROUT	NE WASTES		
PCB Conteminated Chlorobenzene Residue K085, D001, D018, D021, D027, D032	Distillation column bottoms from the production of chlorobenzens Department 233.	Liquid	65-gal Mild Steel Drum & Tank Truck	93233 N/A	Beked phenolic resin costing ²	Baked phenolic coeting recommended for room temperature (<180° service with erometic and chloringted hydrocarbons (Reference: Table "Chemical Resistance of Coetings for Immersion Service", Perry's Childendbook, Sixth Edition).
PCS Conteminated Chlorobenzene P-5dH Residue K085, D018, D021, D027, D032	Distillation Bottoms from the production of dichlorobenzene in Department 224.	Liquid	55-gal Mild Steel Drum & Tenk Truck	93233 N/A	Baked phenolic resin coating ⁹	Baked phenolic coating recommended for room temperature (<160° service with aromatic and chlorinated hydrocarbons (Reference: Table "Chemical Resistance of Coatings for Immersion Service", Perry's Chemideok, Sixth Edition).
PCB Conteminated Carbon DO18	Dry tower spent carbon from HCL gas stream in Chlorobenzene Department 233	Solid	55-gal Mild Steel Drum	93233	Beked phenolic resin costing ²	Baked phenolic coeting recommended for room temperature (<160° service with aromatic and chlorinated hydrocarbone (Reference: Table "Chemical Resistance of Coetings for Immersion Service", Perry's Chi Handbook, Sixth Edition).
MCB Moleculer Sleve Weets D010, D018, D021, D027	Generated during periodic replacement of molecular sleve material in Department 233 (Chlorobenzene production).	Solid	20-gal Fibre Drum	92613	1 mil Polyester barrier	The physical state of this waste stream is a solid. Additional protecti- internal moisture barrier. Fibre drum packaging is authorized by DOT packaging for this material (refer to 49 CFR 172.101). Steel parts are correcton (locking band is electrogetvanized).
Screp PDCS U072, D027, U071	Off-Spec Paradichlorobenzene from equipment cleaning of continuous crystallizer in Department 224.	Solid	20-gal Fibre Drum	92613	1 mil Polyester barrier	The physical state of this waste stream is a solid. Additional protection internal moisture barrier. Fibre drum packaging is authorized by DOT packaging for this material (refer to 49 CFR 172.101). Steel parts are corrosion (locking band is electrogetventzed).
ODCE Molecular Slave Wests 0010, 0027	Generated during periodic replacement of molecular sieve material in Department 224 (Dichlorobenzene production).	Selid	20-gal Fibre Drum	92613	1 mil Polyester barrier	The physical state of this waste stream is a solid. Additional protecti- internal moisture barrier. Fibre drum packaging is authorized by DOT packaging for this meterial (refer to 49 CFR 172.101). Steel parts are correction (locking band is electrogalvanized).
Waste Therminol D008, D018	Heat transfer fluid - hydrogenated terphenyls. Generated plantwide from oil changes in heat transfer systems. May also be generated during equipment repair or spill cleanup. Wastes	Liquid	56-gal Mild Steel Drum	93233	Beked phenolic resin coating ^a	Baked phenotic coating recommended for room temperature (<160° service with aromatic hydrocarbons (Reference: Table 23-23, "Chemic Coatings for Immersion Service", Perry's Chemical Engineers' Handbo Edition).
	generated during equipment repair or split cleanup may be a solid if cleanup/decon done with granular absorbent.	Solid	10 or 20 gallon fibre drum	92087 92613	Myler berrier 1 mil polyester berrier	The physical state of this waste stream when stored in fibre drums in wastee may be stabilized with granular absorbent during cleanup action protection is provided by internal moisture berrier. Fibre drum packag by DOT as non-bulk packaging for this meterial (refer to hazardous w N.O.S, in 49 CFR 172.101).
Wasta Phosphorus D001, D003, D008	Waste Phosphorus from Department 245 equipment cleanouts and infrequent generation of off-spec materials in Department 245.	Solid under water layer	30-gal or 50-gal high density polyethylens drum	See note 4	none	Phosphorus is largely insoluble. Polyethylene has complete resistant phosphoric acid which may form in water layer over waste. (Referent "Detailed Corrosion Data on Construction Materials", Perry's Chemical Handbook, Sixth Edition).

Notes:

^{1 =} Refer to Packaging Specification sheets in Appendix 10 for container construction materials, dimensions and usable volumes, applicable UN standards and DOT specifications, and other manufacturer specifications.

^{2 = 2} coats Heresite P-413D, P-4443 lacquer or equivalent. (Baked phenolic resin, 1.5 mil D.F.T.).

^{3 -} Container size and type may vary for discarded commercial chemical products, raw materials, intermediates, and spill cleanup residues, depending on requirements of effects treatment/disposal facility. Wastes which are discarded raw in original container in which the material was purchased.

^{* -} Specifications for the 30 gallon open top plestic drum used for waste phosphorus are included in the Packing Specification sheets in Appendix 8. Refer to the unnumbered sheet labeled "Waste Phosphorus".

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The physical state of this wante obsern is a solid. Additional protection is provided by internal moisture barrier. Fibre drum packaging is authorized by DOT as non-bulk packaging for this material inviter to 48 CFR 172.101). Steal parts are treated to resist corrosion flocking band is electrogalvanized).	1 mil Polyester berrier	92613	20-gel Fibre Drum	Solid	Material generated from minor spill cleanup (Dept. 233 & 224)	CNoroberzene Residue (Sofid) 0018, 0021, 0027, 0032, K085
The physical state of this waste stream is a solid. Additional protection is provided by internal moisture berrier. Fibre drum peckaging is authorized by DOT as non-bulk peckaging for this material (orier to 48 CFR 172.101). Steel parts are treated to resist corrosion flocking band is electrogalyanized).	1 mil Polyester berrier	92013	20-gel Fibre Drum	Solid	NCB from Dept. 221 equipment cleanouts with filter aid from filter pressing to recover product back to process. This waste stream may also contain NCB mixed with floor dry from minor spill cleanup activities.	Berep NCB and NCB Filter Ad Wests D021, D036
According to 1986 NACE Corrosion Data Survey (Metals Section, 6th edition) the maximum corrosion rate for mild steel in immersion service with constituents in this waste steem is 26-50 mile per year (sesuming nitrobanzens contaminated with water). This maximum corrosion rate is much lower than the RCRA definition of corrosive (> 250 mile/year).	none	×	Tank Car	Liquid/ Solid	Meta-nitrochlorobersane residue byproduct from production of NCB in Dept. 221.	NCB Residue - Meta D021, D038
Refer to Tank 552 Assessment, Appendix 11	none	N/A	6000-gal Aboveground Carbon Steel Tank	Liquid	Nitrochloroberzene still bottoms from Dept. 221 high boiler column sump and off-apec NCB products.	NCB Residue - "High Bollers" D021, D036
Rafer to Tank 595 Assessment, Appendix 12	none	A/N	11,865-gai Aboveground Carbon Steel Tank	Liquid	Ketone Residue westes (primarily ketones and alcohole) generated in Department 277.	Ketone Residue D001, D036
Fibre drum packaging is authorized by DOT as non-bulk packaging for this material lefer to 49 CFR 172.101).	none	92606	10-gal fibre Drum	Liquid/ Solid	Various plant laboratory samples generated in smell quantities.	Lab Packs D001, D021, D022, D027, U037, U070, U071, U072
Beliad phenolic costing recommended for reom temperature (<180° F) immeration service with eliphatic and erometic hydrocerbone (Reference: Table 23-23, "Chemical Resistance of Costings for Immeration Service", Perry's Chemical Engineers' Handbook, Stoth Edition).	Beked phenolic resin coeting ⁸	93233	66-gal Mild Steel Drum	Liquid	Spent lubricants (cutting oils, hydraulic oils, and lubricating oils) from manufacturing equipment maintenance and repeir (from compressors, motors, and pumps plantwide).	Waste OII D018, D036
According to 1985 NACE Corrosion Data Survey (Metals Section, 6th edition) the corrosion rate for mild steel in immersion service with the listed solvents in the paint servent waste (1,1,1-Trichloroethems: POO2, or Toluens: POO5) is less than 2 mile per year.	none	93153	66-gal Mild Steel Drum	Llquid	Waste lacquer and paint thinner from paint shop cleanup of paint spray guns and painting equipment.	Paint Solvent D001, D007, D008, F002, F005
Balad phenolic coating recommended for room temperature (<160° F) immersion service with elcohole, and aliphetic, eremetic, and chlorinated hydrocarbone (Reference: Table 23-23, "Chemical Resistance of Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sorth Edition).	Baked phanolic resin costing?	93233	56-gal Mild Steel Drum	Llquid	Waste solvents mixed with eample residuals from plant QA/QC analysis and other analysis in plant laboratory.	Laboratory Botvent Weets D001, D018, D021, D027, D036, D036, D038, F002, F003, F006
The physical state of this waste stream is a solid. Additional protection is provided by internal moisture barrier. Fibre drum packaging is authorized by DOT as non-bulk packaging for this material furfer to 48 CFR 172.101). Steel parts are treated to resist corrosion (locking band is electrogalvanized).	0.0005° eluminum foil barrier	92088	6-gal Fibre Drum	Solid	Watte and Off-specification Phosphorus Pentasulfide from Department 245.	Wests P,E, D003, U189
COMPATIBILITY ANTOHALE	BANRIER OR INTERNAL COATING TYPE	DRUM STOCK NUMBER ¹	CONTAINER SIZETTYPE	PHYSICAL STATE	WASTE DESCRIPTION	WASTE STREAM COMMON NAME & EPA WASTE CLASSIFICATION
	(AINERS	TABLE D-1	TABLE D-1 DESCRIPTION OF CONTAINERS			

- Refer to Packaging Specification sheets in <u>Appendix 10</u> for container construction materials, dimensions and usable volumes, applicable UN standards and DOT specifications, and other manufacturer specifications.

 2 coasts Heresite P-4.13D, P-4.443 lecquer or equivalent. (Baked phenolic resin, 1.5 mil D.F.T.).

 3 Container size and type may vary for discarded commercial chamical products, raw materials, intermediates, and apill cleanup residues, depending on requirements of effects treatment/disposal facility. Wastes which are discarded raw materials may be packaged in original container in which the material was purchased.
- Specifications for the 30 gallon open top pleatic drum used for wests phosphorus are included in the Packing Specification sheets in Appendix 8. Refer to the unnumbered sheet labeled "Weste Phosphorus".

			T/ DESCRIPTIO	ABLE D-1 N OF CON	TAINERS	
WASTE STREAM COMMON NAME & EPA WASTE CLASSIFICATION	WASTE DESCRIPTION	PHYSICAL STATE	CONTAINER SIZE/TYPE	DRUM STOCK NUMBER ¹	BARRIER OR INTERNAL COATING TYPE	CONTAINER COMPATIBILITY RATIONALE
MCB Spent Carbon D018	Spent carbon from acid purification process in Department 233. (Tank 767)	Solid	7,880-gal Abovegreund Rubber Lined Carbon Steel Tank	N/A	Rubber	Refer to Tank 767 Assessment, Appendix 13
Spent Carbon (Totre) D018, D021, D027	Spent cerbon from vapor phase adsorbers on storage tanks and process vessel vents (Dept. 233)	Solid	96 ft ³ Steel tote bin	N/A	Coal Tar Epoxy	Spent carbon tote bins are stored ensits for less than 90 days. The offsite vendor that regenerates the carbon inspects the tote bin interior each time when the carbon is removed for regeneration.
			PRODUCTS/INTERM	EDIATES/RAI	N MATERIALS	
Pere-nitroeniline, P077	Discarded commercial chemical product, eff- specification material, or potential spill cleanup residue. Departments 218 & 219.	Solid	10 or 20 gallon fibre drum ²	92087 92613	Myler berrier 1 mil polyester berrier	The physical state of this waste stream is a solid (metting point = 199° F). Additional protection is provided by internal moisture berrier. Fibre drum peckaging is authorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172.101). Steel parts are treated to resist corrosion (locking band is electrogalvanized).
Benzene, U019	Discarded raw material (commercial chemical product), off-specification commercial chemical product, or potential raw material spill cleanup residue. (This waste stream could be a solid if	Llquid	65 gal mild steel drum ⁹	93233	Baked phenolic resin coating?	Baked phenotic coating recommended for room temperature (<160° F) immersion service with eromatic hydrocerbons (Reference: Table 23-23, "Chemical Resistance of Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition).
	decon/cleanup done with granular absorbant).	Solid	10 or 20 gallon fibre drum ²	92087 92613	Myler barrier 1 mil polyester barrier	The physical state of this waste stream when stored in fibre drums is a solid (liquid wastes may be stabilized with granular absorbant during cleanup activities). Fibre drum packaging is authorized by DQT as non-bulk packaging for this material (refer to 49 CFR 172.101). Additional protection is provided by Internal moisture barrier.
apecification commercial chemical potential spill cleanup residue. De	Discarded commercial chemical product, off specification commercial chemical product, or potential spill cleanup residue. Department 233. (This waste stream could be a solid if	Liquid	66 gal mild steel drum ³	93233	Baked phenolic resin coating ^a	Baked phenolic coating recommended for room temperature (<160° F) immersion service with aromatic hydrocarbons and chlorinated hydrocarbons (Reference: Table 23-23, "Chemical Resistance of Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition).
decon/cleanup done with granular at		Solid	10 gal or 20 gal fibre drum ³	92087 92613	Mylar barrier 1 mil polyester barrier	The physical state of this waste stream is a solid. Additional protection is provided by internal moisture barrier. Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172.101). Steel perts are treated to resist corrosion (locking band is electrogalvenized).
Ortho-dichlorobenzane (ODBC), U070	Discarded commercial chemical product, off specification commercial chemical product, or potential spill cleanup residue. Department 224. (This waste stream could be a solid if	Liquid	55 gal mild ateel drum ³	93233	Bakad phenolic resin coating ²	Beked phenolic coating recommended for room temperature (<160° F) immersion service with aromatic hydrocarbons and chlorinated hydrocarbons (Reference: Table 23-23, "Chemical Resistance of Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition).
	decon/cleanup done with granular absorbent).	Solid	10 gel or 20 gel fibre drum³	92087 92613	Myler berrier 1 mil polyester berrier	The physical state of this waste stream is a solid. Fibre drum peckaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172,101). Additional protection is provided by internal moisture barrier. Steel parts are treated to resist corrosion (locking band is electrogelvanized).
Para-dichlorobenzene (PDCB), U072	Discarded commercial chemical product, effi- apecification material, or potential spill cleanup residue. Department 224.	Solid	10 gal or 20 gal fibre drum ²	92087 92613	Myler berrier 1 mil polyester berrier	The physical state of this waste streem is a solid (melting point is 127.4° F). Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172.101). Additional protection is provided by internal moisture barrier. Steel parts are treated to resist corrosion (locking band is electrogelyanized).

Notes:

^{* -} Refer to Packaging Specification sheets in Appendix 10 for container construction materials, dimensions and usable volumes, applicable UN standards and DOT specifications, and other manufacturer specifications.

^{2 = 2} coats Heresite P-413D, P-4443 lecquer or equivalent. (Beked phenolic resin, 1.5 mil D.F.T.).

⁻ Container else and type may very for discarded commercial chemical products, raw materials, intermediates, and spill cleanup residues, depending on requirements of offsite treatment/disposal facility. Wester which are discarded raw materials may be package in original container in which the material was purchased.

^{* -} Specifications for the 30 gallon open top plactic drum used for waste phosphorus are included in the Packing Specification sheets in Appendix 8. Refer to the unnumbered sheet labeled "Waste Phosphorus".

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Section .

TABLE D-1 DESCRIPTION OF CONTAINERS

			DESCRIPTIO		(A)(E) RS	
WASTE STREAM COMMON NAME & EPA WASTE CLASSIFICATION	WASTE DESCRIPTION	PHYSICAL STATE	CONTAINER SIZE/TYPE	DRUM STOCK NUMBER ¹	BARRIER OR INTERNAL COATING TYPE	CONTAINER COMPATIBILITY RATIONALE
Xylene, U239	Discarded commercial chemical product (raw material), off-specification meterial, or potential spill cleanup residue. Department 255. (This waste stream could be a solid if decon/cleanup	Liquid	55 gal mild steel drum ³	93233	Beked phenolic resin coating ⁴	Baked phenolic costing recommended for room temperature (<160° F) immersion service with arometic hydrocarbons (Reference: Table 23-23, "Chemical Resistance of Costings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition).
,	done with granuler ebeorbent).	Solid	10 gel or 20 gel fibre drum³	92087 92613	Mylar barrier 1 mil polyester barrier	The physical state of this waste stream when stored in fibre drums is a solid (liquid wastes may be stabilized with granular absorbent during cleanup activities). Fibra drum peckaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172.101). Additional protection is provided by internal moisture barrier.
Formic Acid, U123	Discarded commercial chemical product (raw material) or off-specification material, or potential spill cleanup residue. Department 265. (This waste stream could be a solid if decon/cleanup done with granular absorbent).	Liquid	16 gal plastic (HDPE) tighthead drum ³	93500	None	Polyethylene has complete resistance to all concentrations of Formic Acid at ambient temperatures (Reference: Table 23-2 "Detailed Corrosion Data on Construction Materials", Perry's Chemical Engineers' Handbook, Sixth Edition).
		Solid	10 gal or 20 gal fibre drum ³	92087 92813	Myler berrier 1 mil polyester berrier	The physical state of this waste stream when stored in fibre drums is a solid (liquid wastes may be stabilized with granular absorbant during cleanup activities). Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172.101). Additional protection is provided by internal moisture barrier.
Mathyl leobutyl Katona, U181	Manufacturing chemical intermediate, or potential spill cleanup residue. Department 277. [This waste stream could be a solid If decon/cleanup done with granular absorbent].	Liquid	55 gal mild steel drum ³	93233	Baked phenolic resin coating ²	Baked phenolic coating recommended for room temperature {<160° F} immersion service with eliphatic hydrocarbons (Reference: Table 23-23, "Chemical Resistance of Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition).
		Solid	10 gal or 20 gal fibre drum ³	92087 92613	Myler barrier 1 mil polyester barrier	The physical state of this waste stream when stored in fibre drums is a solid (liquid westes may be stabilized with granular absorbent during cleanup activities). Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172.101). Additional protection is provided by internal moisture berrier.
Phosphorus Sulfide, U189	Manufecturing chemical intermediate, or potential spill cleanup residue. Department 245.	Solid	8-gal Fibre Drum ² or Roll Off	92088	0,0005° aluminum foll berrier	The physical state of this waste stream is a solid. Fibre drum packaging is exthorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172,101). Steel part are treated to resist corrosion (locking band is electrogelvanized). Additional protection provided by internal moisture barrier.

^{* -} Refer to Packeging Specification sheets in Appendix 10 for container construction materials, dimensions and usable volumes, applicable UN stendards and DOT specifications, and other manufacturer specifications.

² coats Heresite P-413D, P-4443 lecquer or equivelent. (Baked phenolic resin, 1.5 mil D.F.T.).

^{3 -} Container size and type may vary for discarded commercial chemical products, raw materials, intermediates, and spill closnup residues, depending on requirements of offsite treatment/disposal facility. Wastes which are discarded raw materials may be packaged in original container in which the material was purchased.

^{* -} Specifications for the 30 gallon open top plastic drum used for wests phosphorus are included in the Packing Specification sheets in Appendix 8. Refer to the unnumbered sheet labeled "Waste Phosphorus".

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TABLE D-1 DESCRIPTION OF CONTAINERS DRUM BARRIER OR INTERNAL CONTAINER WASTE STREAM COMMON NAME WASTE PHYSICAL CONTAINER STOCK COATING TYPE COMPATIBILITY & EPA WASTE CLASSIFICATION DESCRIPTION STATE SIZE/TYPE NUMBER RATIONALE Anillos, UO12 Discarded commercial chemical product (raw 55 gal mild steel drum3 93233 Baked phenolic resin coating? Baked phenolic coating recommended for room temperature (<160° f) immersion material), off-specification material, or potential service with aromatic hydrocarbons (Reference: Table 23-23, "Chemical Resistance of spill cleanup residue. Departmente 255 & 222. Coetings for Immersion Service*, Perry's Chemical Engineers' Handbook, Sixth (This waste stream could be a solid if Edition). decon/cleanup done with granular absorbent). 10 gal or 92087 Mylar barrier The physical state of this waste stream when stored in fibre drums is a solid (liquid 20 gal fibre drum³ 92613 1 mil polyester berrier wastes may be stabilized with granular absorbent during cleanup activities). Fibre Solid drum peckaging is authorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172.101). Additional protection is provided by internal moisture barrier, 66 gal mild steel drum³ 93233 Baked phenolic resin coating² Discarded commercial chemical product (raw Baked phenolic coating recommended for room temperature (<160° F) immersion Methyl Ethyl Katona, U159 Liquid service with eliphetic hydrocerbons (Reference: Table 23-23, "Chemical Resistance of material), off-specification material, or potential Coatings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth. spill cleanup residue. Department 277, (This Edition). waste stream could be a solid if decon/cleanup done with granular absorbent). 92087 10 gal or Mylar barrier The physical state of this waste stream when stored in fibra drums is a solid fliquid 92613 1 mil polyester berrier Solid 20 gel fibre drum³ wastes may be etablized with granular absorbent during cleanup activities). Fibre drum peckaging is authorized by DOT as non-bulk packaging for this material (refer to 48 CFR 172.101). Additional protection is provided by internal moisture parrier. NON-ROUTINE WASTE 92613 1 mil Polyester barrier The physical state of this waste stream is a solid. Additional protection is provided by Benzene Conteminated Spill cleanup and/or non-routine equipment Solid 20-gal Fibre Drum Equipment/PPE and Miscellaneous decon in Departments 233 & 224, or internal moisture barrier. Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172.101). Steel parts are treated to resist Materials including Benzens Department 233 Sump Cleanout (send and Conteminated Send and Carbon, corrosion (locking band is electrogalvanized). carbon). D018, D021, D027 Llquid 66-gallon Steel Drum 93233 Baked phenolic resin coating^a Baked phenotic coating recommended for room temperature (<160° F) immersion service with aromatic hydrocarbons (Reference: Table 23-23, "Chemical Resistance of Costings for Immersion Service", Perry's Chemical Engineers' Handbook, Sixth Edition). Covered PE lined Mercury contaminated soil from former Chlor The physical state of this waste stream is a solid. Additional protection is provided by Mercury Conteminated Soil, DO09 Alkali process area. Rolloff or NA internal moisture berrier in fibre drum or polyethylene liner if in rolloff. Mercury 10 gal or 92087 Mylar barrier contaminated soil would not act as a solvent to the reliaff's polyethylene liner, nor be-

Notes:

Chlorophenol Conteminated

D041, D042, F020, F021

Material, 0022, 0032, 0037,

20 gel fibre drum

66- and 86-gallon

drums overpacked in

110 gal, 16 gauge

steel overpack drums

Possible wastes from the past production of Trl,

Tetra, and Penta Chlorophenoi

92613

none

1 mil polyester barrier

Rust resistant interior and

exterior paint coating.

corrosive to steel if the liner were punctured or torn. Fibre drum packaging is authorized by DOT as non-bulk packaging for this material (refer to 49 CFR 172,101).

Exterior rust resistant point coating. Drums inspected weekly, will be overpacked or contents transferred to a new drum if evidence of rusting or corresion is identified.

[🗽] Refer to Packaging Specification sheets in Appendix 10 for container construction materials, dimensions and usable volumes, applicable UN standards and DOT specifications, and other manufacturer specifications.

² n 2 coats Herasite P-413D, P-4443 lacquer or equivalent. (Baked phenolic resin, 1.5 mil D.F.T.).

Container size and type may vary for discarded commercial chemical products, raw materials, intermediates, and spill cleanup residues, depending on requirements of offsite treatment/disposal facility. Wastes which are discarded raw materials may be packaged in original container in which the material was purchased.

⁻ Specifications for the 30 gallon open top pleatic drum used for waste phosphorus are included in the Packing Specification sheets in Appendix 8. Refer to the unnumbered sheet labeled "Waste Phosphorus".

Attachment A ADDENDUM TO FORM 3

Listed below are solid wastes that do not meet any RCRA category but are considered hazardous under Illinois Law or by Monsanto Guidelines.

	WASTE NAME	ANNUAL QUANTITY	UNITS	PROCE	SS CODE
Α.	Waste Therminol	30,000	P	SOl	т03
в.	Used Compressor Oil	10,000	P	sol	тоз
c.	Scrap Sulfur	20,000	P	sol	TO3
D.	Used Laboratory Glassware	5,000	P	sol	TO3
E.	Non-Hazardous Lab Samples	2,000	P	sol	т03
F.	Silicon Dioxide Filter Aid	50,000	P	sol	тоз
G.	Quaternary Exchange Resin	300	P	sol	TO3
н.	Salt Saturator Solids	1,000	P	sol	тоз
ı.	Spent Vanadium Catalyst	0	P	SOl	тоз
J.	Paraphenetidine Still Residue	60,000	P	sol	тоз
К.	Triphenyl Phosphate Residue	40,000	P	sol	тоз
L.	Nitrodiphenyl Amine Residue	200,000	P	sol	TO3
м.	Scrap Orthonitrophenol	30,000	P	SOl	TO3
х.	Liquid Lab Samples	54,000	. P	sol	TO3
Ο.	Solid Lab Samples	104,000	P	sol	тоз
Р.	Chlorotoluene Contaminated Carbon	20,000	P	SOl	тоз
Q.	Orthonitroaniline Residue	360,000	P	SOl	тоз
R.	Toluene Contaminated Filters	10,000	P	SOl	тоз
s.	Benzene Contaminated Filters	2,000	P	SOl	тоз
T.	Santicizer-160 Contaminated Filter Aid	15,000	P	sol	т03
U.	Benzene Contaminated Carbon	180,000	P	sol	тоз
٧.	Phthalic Anhydride Waste	75,000	P	SOl	тоз
Sig	Orthodichlorobenzene Still Bottoms	50,000	P	SOl	TO3

	WASTE NAME	ANNUAL QUANTITY	UNITS	PROCESS COD
х.	Paranitrochlorobenzene Contaminated Equip		P	SO1
Υ.	Paranitroaniline Contaminated Equipment	1,000	P	sol
2.	Nitrodiphenylamine Contaminated Equip.	1,000	P	so1
(aa)	Chlorophenol Still Bottoms	50,000	P	SOI, TOI, T
(bb)	Scrap Nitrated Dodecylbenzene	1,000	P	SO1 TO3
(cc)	Scrap Nitrated Orthodichlorobenzene	10,000	P	SO1 TO3
(dd)	Scrap Santophen I Product	5,000	P	SO1 TO3
(ee)	Nitrochlorobenzene Residue 4	,250,000	P	SO1 TO3
(ff)	Off Spec P-Tert-Butylphenol	20,000	P	SO1 TO3
(gg)	Paranitrochlorobenzene Sludge	150,000	P	SO1 TO3
(hh)	Scrap Paranitrochlorobenzene	10,000	P	SOl TO3
(ii)	Benzene Contaminated Equipment	1,000	P	SOl TO3
(jj)	Orthonitrochlorobenzene Product -	20,000	P	SO1 TO3
(kk)	TSCL STO Still Residue	740,000	P	SO1 TO3
(11)	DCA Still Residue	53,000	Р	SO1 TO3
(mm)	AZO Residue	L',500,000	P	SO1, SO2, TG
(nn)	Phenolic Residue	L,500,000 ·	P	SO1 TO3
(00)	PNPT Filter Cartridges	41,000	P	SO1 TO3
(pp)	p-Phenetidine Residue	31,000	P	sol To3
(pp)	PCE Still Residue	414,000	P	SO1 TO3
(rr)	Reject Para-TSCL	105,000	P	SO1 TO3
(ss)	Waste Oils	150,000	P	SO1 TO3
(tt)	Dimethyl Formamide	48,000	P	SO1 TO3